## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§	
	§	Chapter 7
ERIN ENERGY CORPORATION, et al.,	§	
	§	Case No: 18-32106
Debtors	§	
	§	
	§	(Jointly Administered)
	§	
	<u>§</u>	

## **NOTICE OF APPEARANCE**

PLEASE TAKE NOTICE THAT the undersigned counsel and the law firm of Grant & Eisenhofer P.A., pursuant to Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules" and section 1109(b) of title 11 of the United States Code (the "Bankruptcy Code"), hereby enters their appearance as counsel for Robert Lenois in the above-captioned bankruptcy cases (the "Cases") and respectfully requests that the name of counsel listed below be added to the mailing list maintained by the Clerk, and that all notices given or required to be given in these Cases, all pleadings and other papers served, or required to be served, in these Cases, be given to and served upon the following:

Gordon Z. Novod
GRANT & EISENHOFER P.A.
485 Lexington Avenue, 29<sup>th</sup> Floor
New York, NY 10017
Tel: 646-722-8523

Fax: 646-722-8501 Email: gnovod@gelaw.com PLEASE TAKE FURTHER NOTICE THAT, pursuant to section 1109(b) of the

Bankruptcy Code, this request includes not only the notices and papers referred to in the

Bankruptcy Rules and section of the Bankruptcy Code specified above, but also includes, without

limitation, any notice, application, complaint, demand, motion, petition, pleading or request,

whether formal or informal, written or oral, whether transmitted or conveyed by regular mail,

electronic mail, delivery service or some other means, or otherwise filed or made with regard to

these Cases and proceedings herein. Further this request includes copies of any disclosure

statements to be submitted prior to approval and any and all plans of reorganization.

PLEASE TAKE FURTHER NOTICE THAT, this Notice of Appearance and Request for

Service of Papers shall not be deemed to be or construed as a waiver of Robert Lenois's rights:

(a) to have final orders in non-core matters entered only after de novo review by a District Judge,

(b) to trial by jury in any proceeding so triable in this case or in any case, controversy or proceeding

related to this case; or (c) to have the District Court withdraw the reference in any matter subject

to mandatory or discretionary withdrawal. This Notice of Appearance and Request for Service of

Papers is likewise not a waiver of any other rights, claims, actions or setoffs to which Robert

Lenois may be entitled, in law or in equity, all of which rights, claims actions, defenses and setoffs

Robert Lenois expressly reserve.

Respectfully submitted,

By: /s/ Gordon Novod

Gordon Z. Novod (pro hac vice pending)

**GRANT & EISENHOFER P.A.** 

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2

and

Michael J. Barry (pro hac vice pending) GRANT & EISENHOFER P.A.

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Attorneys for Robert Lenois

## **CERTIFICATE OF SERVICE**

On January 29, 2019, a copy of the foregoing Notice of Appearance and Request for Service of Papers was served on all parties receiving electronic notification in these cases from the Court's CM/ECF system.

Gordon Z. Novod	
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